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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARIO LAMONT JONES,

Defendant.

Case No.: 2:21-cr-00273-GMN-VCF

**Stipulation for Extension of Time
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, counsel for the United States of America, and Nisha Brooks-Whittington, Assistant Federal Public Defender, counsel for Defendant MARIO LAMONT JONES, that the date for the Government to file a response to the Defendant's Motion to Reopen Detention Hearing (ECF No. 24) be extended for seven days, specifically to **February 7, 2022**, and the hearing scheduled on February 7, 2022, be vacated and rescheduled at the Court's earliest convenience following the filing of the government's response.

This stipulation is entered for the following reasons:

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1. The Defendant's Motion was filed and served on January 19, 2022. *See* ECF No. 24. The Government's response deadline is presently January 31, 2022. *See* ECF No. 25.
2. The Court scheduled a hearing on the motion to reopen for February 7, 2022. *See* ECF No. 25.
3. Counsel for the Government is in need of additional time to conduct additional investigation and research to adequately respond to the Defendant's motion.
4. The additional time requested herein is not sought for purposes of delay, but to allow counsel for the Government time to adequately respond to the Defendant's motion.
5. Additionally, denial of this request for continuance could result in a miscarriage of justice.
6. This is the first stipulation filed herein to continue the Government's response deadline.
7. The parties agree to the extension of time.

DATED: January 28, 2022

Respectfully submitted,

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Bianca R. Pucci

BIANCA R. PUCCI
Assistant United States Attorney

/s/ Nisha Brooks-Whittington

NISHA BROOKS-WHITTINGTON
Counsel for Defendant
Mario Lamont Jones

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:21-cr-00273-GMN-VCF
)	
Plaintiff,)	
)	
v.)	
)	
MARIO LAMONT JONES,)	
)	
Defendant.)	
_____)	

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The Defendant's Motion was filed and served on January 19, 2022. *See* ECF No. 24. The Government's response deadline is presently January 31, 2022. *See* ECF No. 25.
2. The Court scheduled a hearing on the motion to reopen for February 7, 2022. *See* ECF No. 25.
3. Counsel for the Government is in need of additional time to conduct additional investigation and research to adequately respond to the Defendant's motion.
4. The additional time requested herein is not sought for purposes of delay, but to allow counsel for the Government time to adequately respond to the Defendant's motion.

1 5. Additionally, denial of this request for continuance could result in a miscarriage
2 of justice.

3 6. This is the first stipulation filed herein to continue the Government's response
4 deadline.

5 7. The parties agree to the extension of time

6 For all of the above-stated reasons, the ends of justice would best be served by a
7 continuance of the Government's response deadline.

8 **CONCLUSIONS OF LAW**

9 The additional time requested herein is not sought for purposes of delay, but to allow the
10 Government with adequate time to respond to the Defendant's motion. The failure to grant
11 said continuance would likely result in a miscarriage of justice.

12 **ORDER**

13 IT IS THEREFORE ORDERED, that the previously-scheduled response deadline for
14 the Government to respond to the Defendant's Motion to Suppress is extended until February
15 7, 2022.

16 IT IS FURTHER ORDERED, that the previously-scheduled hearing scheduled for
17 February 7, 2022, is vacated and reset to February 9, 2022 at 1:00 PM.

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19
20 DATED this 28th day of January, 2022.

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22 _____
23 HONORABLE CAM FERENBACH
24 UNITED STATES MAGISTRATE JUDGE